



# *S&A Telephone Co.*

413 Main St. • P.O. Box 68 • Allen, KS 66833-0068  
(620) 528-3223 or (800) 626-8859

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February 18, 2008

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

via ELECTRONIC FILING

RE: EB Docket No. 06-36  
Annual CPNI Certification for Year 2007

Dear Ms. Dortch:

In accordance with Public Notice DA 08-171, issued on January 29, 2008, enclosed is an original of the annual CPNI certification filing for the year of 2007 for S&A Telephone Company, Inc.

Sincerely,

Janet M. Bathurst  
General Manager

Enclosures

cc: Federal Communications Commission (*two copies*)  
Enforcement Bureau  
Telecommunications Consumers Division  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Best Copy and Printing, Inc. (*one copy*)  
via email ([FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))

## **Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for: 2007

Date filed: February 18, 2008

Name of company covered by this certification: **S&A TELEPHONE COMPANY, INC.**

Form 499 Filer ID: 804630

Name of signatory: Janet M. Bathurst

Title of signatory: General Manager

I, Janet M. Bathurst, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information

S&A TELEPHONE COMPANY, INC.

BY: 

Janet M. Bathurst  
General Manager  
PO Box 68, 413 Main Street  
Allen, Kansas 66833-0068  
(620) 528-3223

**ATTACHMENT**

## **STATEMENT OF COMPLIANCE WITH CPNI RULES**

**S&A TELEPHONE COMPANY, INC.** (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

### Compliance Officer

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

### Employee Training:

The Compliance Officer arranges for the training of all employees on an annual basis, and more frequently as needed. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using. The detail of the training can differ based on whether or not the employee has access to CPNI.

After the training, all employees are required to sign a certification that they have received training on the CPNI rules, that they understand the Company's procedures for protecting CPNI and they understand the Company's disciplinary process for improper use of CPNI. Each employee is issued a copy of the CPNI manual during training.

Employees are instructed that if they ever have any questions regarding the use of CPNI, or if they are aware of CPNI being used improperly by anyone, they should contact the Compliance Officer immediately.

### Disciplinary Process

The Company has established a specific disciplinary process for improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any or a combination of the following: retraining the employee on CPNI rules, notation in the employee's personnel file, suspension or termination.

The disciplinary process is reviewed with all employees.

A copy of the Company's disciplinary process is kept in the CPNI manual.

### Customer Notification and Request for Approval to Use CPNI

The Company has provided notification to its customers of their CPNI rights and has asked for the customer's approval to use CPNI via the opt-out method. A copy of the notification is also provided to all new customers that sign up for service.

The status of a customer's CPNI approval is prominently displayed as soon as the customer's account is accessed so that employees can readily identify customers that have restricted the use of their CPNI.

For the customers that have opted-out and said the Company cannot use their CPNI, that decision will remain valid until the customer changes it.

The company sends the opt-out notice every two years to those customers that have not previously opted out.

The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

A copy of the most recent notification is kept on file in the Compliance Officer's office.

#### Marketing Campaigns

If the Company uses CPNI for any marketing campaign, the Compliance Officer will review the campaign and all materials to ensure that it is in compliance with the CPNI rules.

The Company has a process for maintaining a record of any marketing campaign of its own, or its affiliates, which uses customers' CPNI.

#### Authentication

The Company does not disclose any CPNI until the customer has been appropriately authenticated as follows:

**In-office visit** - the customer must provide a valid photo ID matching the customer's account information.

**Customer-initiated call** – the customer is authenticated by providing an answer to a pre-established question and must be listed as a contact on the account.

If the customer wants to discuss call detail information that requires a password, the following guidelines are followed:

- If the customer can provide all of the call detail information (telephone number called, when it was called, and the amount of the call) necessary to address the customer's issue, the Company will continue with its routine customer care procedures.
- If the customer cannot provide all of the call detail information to address the customer's issue, the Company will: (1) call the customer back at the telephone number of record, (2) send the information to the address of record, or (3) ask the customer to come into the office and provide a valid photo ID.

#### Notification of Account Changes

The Company promptly notifies customers whenever a change is made to any of the following:

- Customer response to a back-up means of authentication.
- Online account.
- Address of record.

The notification to the customer will be sent to the address (postal) of record.

The Company has a process for tracking when a notification is required and for recording when and how the notification is made. The billing software automatically alerts users when CPNI notifications are required. The employee then prints the notice and mails to the address on record that same day.

#### Notification of Breaches

Employees will immediately notify the Compliance Officer of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>.
- Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless the USSS or FBI has requested an extension.
- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.

#### Summary of Consumer Complaints

There were no consumer complaints regarding unauthorized release of CPNI in previous year.

#### Action against Data Brokers

There were no actions taken against data brokers or pretexters for unauthorized access to CPNI in the previous year.

#### Record Retention

The Company retains all information regarding CPNI in the Compliance Officer's office. Following is the minimum retention period we have established for specific items:

- CPNI notification and records of approval – one year
- Marketing campaigns – one year
- Breaches – two years
- Annual certification – five years
- Employee training certification – two years
- All other information – two years

#### Miscellaneous

A local bank is a drop box payment location for the company. Bank staff has been apprised of CPNI rules. Thus, customers will speak directly to telephone company employees over the telephone provided to be authenticated before any account information is accessed.